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RECEIVED
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Office of Environmental Cleanup

February 20, 2017

Lori Cora
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 10, ORC-158
1200 Sixth Avenue
Seattle, WA 98101-3140

Reference: EPA Request for Additional Data About Possible Potentially Responsible Parties L.B. Foster Company, Beall Equipment Co. And Wabash National

Dear Ms. Cora:

Enclosed please find Northwest Pipe Company's submission of information on prior owners and operators at the ECSI #138 site during the period 1950 to 1982. We are enclosing:

-List of documents submitted;

-Narrative to explain the submitted documents;

-CD-ROM with copies of the documents.

These documents are in response to your request to my colleague Michael Merchant for further information on prior owners and operators at the facility currently owned by Northwest Pipe Company.

Very truly yours,

Steven R. Schell

Enclosures
SRS:tch
1261431
cc: client
MBM

List of documents for EPA
RE: Operations of Beall Tank & Pipe Co. and LB Foster

DOC NO	
NWP0033369-33396	Exhibit S-35 Beall Corporation and St. Johns Corporation Memorandum and Exhibits (2015 supplement to 104(e) Response)
NWP0025691	Notes of interview with Eldon Hopkins, 10/27/10
NWP0033377	Statements and Declaration of William Tagmyer Exhibit S-34 Memo on L.B. Foster, at NWP0033377 (2015 supplement to 104(e) Response)
NWP0025679	Affidavit of Gary A. Stokes
NWP0032862-33075	Exhibit S-24-1 Notes on Interviews with Harold Parrett November 2010, with attachments (2015 supplement to 104(e) Response)
NWP0032933	BPT 10-68 standard specifications and design details for Coal-Tar Enamel Lined & Coated Steel Pipe (Exhibit S-24-1.3, 2015 supplement to 104(e) Response)
NWP0032950	BPT 11-68 standard specifications and design details for Cement – Mortar Lined and Coated Steel Pipe (Exhibit S-24-1.4, 2015 supplement to 104(e) Response)
NWP0032967	BPT 12-68 standard specifications and design details for Cement – Mortar Lined And Coal-Tar Enamel Coated Steel Pipe (Exhibit S-24-1.5, 2015 supplement to 104(e) Response)
NWP0032904	Brochure – Beall Pipe and Tank Company – "Steel Pipe" (Exhibit S-24-1.2, 2015 supplement to 104(e) Response)
NWP0032991	*Wherever Water Flows Steel Pipes It Best*, a Publication by the Steel Plate Fabricators Association (Exhibit S-24-1.7, 2015 supplement to 104(e) Response)
NWP0016369	Article –Sunday Oregonian 6/18/1961 –"Six Alarm Blaze Sweeps Through Beall Plant"
ATPUB0504171	Exhibit S-30 Beall 1961 Assembly Building -Fire Records of the Oregon State Fire Marshall and Fire Insurance Rating Bureau (2015 supplement to 104(e) Response)
NWP0018284	Exhibit S-31 Fire of 1966 – Destruction of Beall Enameling and Wrapping Building – News Clipping from The Oregonian, 8/23/66 (2015 supplement to 104(e) Response)
NWP0033353	Article – Sunday Oregonian 11/20/77 – "Beall Pipe more aggressive" (2015 supplement to 104(e) Response)
NWP0033354	Beall Pipe and Tank Corp.'s *Steel Pipe* Booklet on Manufacturing Steel Pipe (Exhibit S-34, Exhibit 8, 2015 supplement to 104(e) Response)
NWP0026256-0026269	Exhibit S7 -Historic Aerial Photos 1962-1995 (Supplement to 104(e) Response Exhibit 34)
NWP0017454	Exhibit 58 1962 Map of Beall Sanitary System
NWP0016631	Exhibit 53 Beall Stormwater Drainage (last updated in 1974)
NWP0018699	Electrical diagrams, Includes Beall Pipe and Tank Corp. Plant

	Layout 2/2/80
NWP0033310-33368	Exhibit S-34 L. B. Foster Memorandum and Exhibits (2015 supplement to 104(e) Response)
NWP0016538	Supplemental Environmental Data Summary and Evaluation – Northwest Pipe Company Portland Plant, CH2M Hill, 12/08/2011
NWP0019194	Provenance of Polynuclear Aromatic Hydrocarbons in Soil, Northwest Pipe Company, Portland Oregon, CH2M Hill 4/19/2013
NWP0016578	Additional Soil and Roof Runoff - CH2M Hill April 2010
NWP0018881	Letter Memo on 1989 Contamination-CH2M Hill 12-13-12
NWP0019051	Stained Soil Investigation –CH2M Hill 8-21-2012
NWP0032984	Exhibit S4-1.6 Aerial Photos (Beall at NWP0032990) (supplement to 104(e) Response Exhibit s4)
NWP0033459	Deed Book 1408 Page 375 Dulien to Beall Pipe and Tank Corp 5/29/1950
NWP0033462	Deed Book 1576 Page 2073 Beall to Multnomah Land and Equipment, 2/2/1982
NWP0033468-33531	*Transportation Equipment Cleaning Point Source Category, (40 CFR § 442)*, EPA Permit Guidance Document March 2001 (EPA-821-R-01-021)
NWP0033532-33533	Oregon Well Record 001824 –Beall Pipe and Tank Corp
NWP0033534-33543	USACE NPDES Permit 6739 Serial 00188-Beall Pipe and Tank Corp
NWP0033544-33552	Beall Records of Electric Transformers onsite, 1973-1977
NWP0033553-33559	Oregon DEQ Application for Air Contaminant Discharge Permit by Beall Pipe and Tank Corporation
NWP0033560-33668	Beall Correspondence with Oregon DEQ on Air Contaminant Discharge Permit
NWP0033669-33674	Excerpts from L.B. Foster Company's SEC Form S–1 filed 4/30/81

NORTHWEST PIPE COMPANY'S SUBMISSION TO EPA REGION X
Information on Prior Owners and Operators:
L.B. Foster Company, its Beall Tank and Pipe Company Division, and Successors
2/20/2017

Northwest Pipe Company received a request from Lori Cora of EPA Region X, who is determining whether the EPA should inform additional PRPs of possible liability. She asked for evidence of contamination that may have originated from these entities. Northwest Pipe Company has some relevant information on operations of prior owners and operators L.B. Foster Company and its Beall Tank and Pipe Company division, as well as some successors to Beall. We are providing documents responsive to that request, along with an index to the documents, accompanied by the following narrative.

L.B. Foster's Beall Pipe and Tank Division operated on the current ECSI 138 site from 1950 to 1982. The operations consisted of: the manufacture of straight seam welded pipe and irrigation pipe; the manufacture and coating of large diameter spiral welded, steel pipe; and the construction, cleanout and repair of truck tanks. During this period several groups of COCs were generated, including PAHs and PCBs.

One source of PAHs was activities in the lining and coating building ("L/C"). This same building was called the "Smokehouse" during part of the time the Beall division of L.B. Foster operated there. Depending on the customer's needs and the conditions at a destination site, pipe lengths would be treated both inside and out, and some were wrapped in paper. Sometimes epoxy products and xylene were used. Sometimes heated coal tar was used. As another alternative, the pipe could be covered with a cement mortar. At the L/C building a demister and baghouse system was used to capture the vapors off the treatment process. The demister had a drip area that required remediation by removal of the contaminated soils to a considerable depth.

A second source of PAHs was the Beall processes for application of hot coal tar enamel or asphalt applied to horizontal and vertical pipe in Bay 9 of ECSI 138. (Section IV, page 3 of the Beall Brochure, NWP0032904).

A third source of PAH COCs was the truck tank cleanout process undertaken during the Beall division occupancy (See tanks at the manufacturing facility's northeast property line in the 3 aerial photos in Exhibit S-7 at NWP0026258-26260 taken in 1962). Leaking truck tanks could not be repaired unless they were cleaned. Oil tankers, for instance, would require careful cleaning with the waste water being caught in the various sumps that existed on the site. As part of the oil there would be PAHs placed in the sumps. These sumps in turn needed remediation to remove the PAHs. See EPA Guidance Document –"Transportation Equipment Cleaning Point Source Category (40 CFR § 442)". At some point prior to 1982, a portion of the Beall Division also separated and became Beall Equipment Co., which in 2013 became a part of the Walker

Group, a division of Wabash National. (See Website: http://www.bealltrailers.com/about-us/history)

A fourth source has to do with the "pyrogenic" PAHs found in the International Terminals Slip sediments. During the Beall division occupancy there were two significant fires on the ECSI 138 site, one in 1961 where the structure on site, known in WW II as the Assembly Building, was destroyed. There are informative reports on this fire from the Oregon State Fire Marshall, (which was made available to EPA as document S-30 with NWP's 2015 104(e) update). The other was a partial destruction of the "smokehouse" in 1966. The "pyrogenic" PAHs from the upland site found the storm water pathway to Outfall 18 (WR-123) and into the IT Slip sediments (NWP0016541).

During the L.B. Foster-Beall era several upland sources of TPCBs have been located, and these are the same aroclors currently found in a portion of the IT Slip sediments. First, the Old Assembly Building was filled with transformers, originally in 4 substations as part of an 11,000 volt electrical distribution system built in the WW II era. Several of those transformers had pyranol in them to manage the heat. When the Assembly Building burned in 1961 it is highly likely that these transformers or their replacements were destroyed and PCBs were released. In addition the conduit that carried the high voltage likely was wrapped with a PCB laden insulator; and this system would have been destroyed in the fire. Likewise there was a substantial transformer complex adjacent to the smokehouse which likely was damaged in the 1966 fire.

A second source of TPCBs during the L.B. Foster-Beall division era is the existence of replacement transformers installed after the 1961 and 1966 fires. When Northwest Pipe commenced operations on the site in 1982 these transformers, which had PCB laden oils in them, were in place and some had leaked.
-See Beall Records of Electric Transformers onsite, 1973-1977, handwritten notation, "Yes" under 'Leaks'.

A third source of TPCBs is found in a part of the easternmost stormwater system which could not be cleaned out until new ports were installed, which occurred recently. The storm water line along the eastern side of the bays (the burned assembly building replacement structures) had PCBs and PAHs in the blockage materials. PCB Aroclor 1254 was detected in this line and, because it did not have any PCB Aroclor 1260, it probably was not related to the WW II shipyard period (NWP0016539) Likewise PAHs samples correlate with the PAHs in the IT slip sediments, but may not have been deposited during the WW II shipyard era or after 1982, leading to the inference that they are from the L.B. Foster-Beall period (NWP0016540).

A fourth source of TPCBs is the likely common failure of hydraulic systems in forklifts and vehicles needed to move truck tanks and pipe on the site.

Collected soils samples with contaminants are deep (7 to 14 feet) (NWP0019053) leading to an inference that deposits were made during or before the L.B. Foster-Beall division era. Soils samples showed detects for total PAHs (NWP 0019062) and TPH (NWP0019063).

The property that Northwest Pipe Company operates from today was purchased by Beall Tank And Pipe Company ("Beall") beginning in May of 1950 with the purchase of the property where the main production buildings are located.

-Warranty Deed, Book 1408, Page 375, May 29, 1950 Multnomah County Deed records.
-Exhibit 2 to NWP 104(e) Response, at NWP 10921

Beall purchased other parcels adjoining the main property over the years 1950 to 1982. Beall, then operating as a division of L.B. Foster Company, sold the property to Multnomah Land and Equipment Company on February 2, 1982. (Multnomah Land and Equipment Company was the direct predecessor in interest to Northwest Pipe Company, and was created for the purpose of buying the property for Northwest Pipe).

-Warranty Deed, Book 1576, Page 2073, February 2, 1982, Multnomah County Deed records.
- Exhibit 2 to NWP 104(e) Response, at NWP 11061

Beall is listed in the 1950 edition of the Portland Polk City Directory beginning in 1950, and continues to be listed in the directory at the same location in each year's directory up through 1986-1987 (although Northwest Pipe Company had taken over the property by then). The business is described as "Manufacturers of metal pipe, flumes, tanks, corrugated culverts, semi-trailers, truck tanks, transport units, logging trailers and hoists, and dump bodies"; and also "manufacturers of welded steel pipe, tanks, corrugated culverts, tank trailers, tanks, and logging trailers."
-Exhibit S-35 to NWP 104(e) Response, at NWP0033374-76

Beall operated a truck tank and trailer repair operation, until the early 1960's:

> "For many years, at the Burgard site, Beall Pipe and Tank Corporation, in addition to manufacturing pipe, operated a truck tank manufacturing and repair business, which at some point bore the name of Beall Trans-Liner. Because the business included tank repair, there likely were cleanout and other operations dealing with repairs at areas on the site. However, the truck tank manufacture and repair business had been transferred out of the Burgard site before the L.B. Foster takeover. In 1980 the name of company was changed to eliminate the "Tank" reference and became Beall Pipe Inc."
> - Exhibit S-35 Statements and Declaration of William Tagmyer, at NWP0033379 (2015 supplement to 104(e) Response)

"Prior to the early 1960s fire in Bays 10 and 11, the Beall tank, truck and trailer repair operation functioned. There was a cleanout area for the trucks and trailers just west of Bay 11 and north of what is now the lining and coating operation. There a steam jenny was used to scour the tanks so they could be worked on and welded. All sorts of cleanouts happened, from gas and oil tanker trucks and trailers to milk trucks. Thus, the cleanout could have accumulated many kinds of PAHs and other COCs."
- Exhibit S-35 Interview of Harold Parrett, at NWP0033380 (2015 supplement to 104(e) Response)

"Beall Transliner (the name given to the truck tank repair business for Beall) operated out of Bay 1 for many years. This operation was moved in the mid-1970s. By 1980, they were entirely out of Bay 1. Beall bought property in Rivergate and move the Transliner operation there."
- Exhibit S-35 Interview with Eldon Hopkins at NWP0033350 (2015 supplement to 104(e) Response)

Beall Pipe and Tank Company operated as a manufacturer of coated steel pipe. The products they manufactured were much the same as the products manufactured now by Northwest Pipe Company, and in fact the two companies were direct competitors for a time. Beall was a closely held company, and therefore there are few public documents that describe their operations. Most of what we know of their operations come from interviews with employees who knew of their operations, particularly an interview with Mr. Harold Parrett. Mr. Parrott worked at Beall beginning in 1959. He left Beall 1967 and joined the new Northwest Pipe and Casing Company, which had begun operations in Clackamas Oregon.

-Exhibit S-35 Interview with Harold Parrett at NWP0033380 (2015 supplement to 104(e) Response)

Mr. Parrett provided these descriptions of the Beall pipe manufacturing operation:

Mr. Parrett first worked as a feeder for a manual hand blast operation in Bays 8 and 9 (all sandblasting uses steel grit). After this he worked as a scalp slitter for ERW (i.e., electric resistance welding) mills in Bays 5 & 6, and shortly after he started he came to operate the equipment. Later, Mr. Parrett moved to the Bell and End Forming Area where ends of the pipe were flared out so other pipe could be fitted within the flared-out ends.

During this time, asphalt was used to cover pipe. Before the 1960s bays fire, the welded pipe or galvanized culvert pipe would be horizontally submerged into a hot asphalt tank. After the 1960s fire, vertical tanks were used.

In another process, asphalt was applied to the exterior, top of the pipe and ran down over the pipe into a pan at the bottom of the mobile carrier that would catch the drippings. When the carrier ran out of hot asphalt, it would be moved to a large vat near the vertical pipe dipping area where the drippings would be placed back in the tank and the carrier

reloaded. Sometimes during a break Mr. Parrett would talk with the employees applying the asphalt while he rode along on the carrier.
-Exhibit S-35 Interview with Harold Parrett at NWP0033380 (2015 supplement to 104(e) Response)

Mr. Parrett describes the processes further,

There are two kinds of welders used to make pipe, the spiral pipe welding machines, which use fusion welding, and the straight or tubular pipe operations, which use Electric Resistance Welders (ERW). Both are high electricity users. The submerged arc form of fusion welding process, which is used on the spiral pipe machines, uses generators not transformers.

In Bay 6 there was a straight seam pipe operation. Between Bay 5 and Bay 6, where the ERW machines were located, was the only area where transformers were on racks above the work floor. The transformers were complex equipment (something like big radio tubes that operated at several thousand cycles per second) and repairs of any significance were done by Therma Tool, a professional servicing company. The transformers in place prior to the 1960s fire would have had PCBs in them. The transformers had the caps welded on them, making them closed units, so any PCBs that may have been in them could not escape. During the Beall era their electrician was Bill Sheco; he may have had the ability to perform any repairs needed. Mr. Parrett knows of no time whatsoever where PCBs leaked out of those transformers containing PCB oil.

Mr. Parrett was experienced in applying coatings to pipe. Generally, the pipe needs to be cleaned by sandblasting using steel grit and then "flood coated" through a nozzle (known as a ware) to prevent rusting. Polyken is a tape used to wrap the pipe. It may have an undercoating of black tape. It comes in several colors – white for irrigation, blue for potable water, purple for sewers. Coal tar enamel is another coating which can be requested by customers. It is applied by heating the coal tar enamel and then drizzling onto the pipe through a funnel connected to a recirculating heating system for the coal tar enamel. Coal tar enamel can also be sprayed inside the pipe. Xylene is also used. It may have an undercoating of toluene or a primer of glue or mastic. If there is a spill of xylene or toluene, there is a talc that is kept readily available; it is placed on the spill immediately and absorbs the spill; after that it is swept up and disposed of off site. The ends of the pipe are frequently wiped down with rags and brushes. These used rags and brushes are collected and disposed of off site.

If the coal tar enamel process breaks down then the enamel hardens, the process has to be disassembled and the enamel has to be chipped out and reheated. The remnants are disposed of off site.

Two types of absorbents are used when spills occur: talc in the lining and coating area, and kitty litter (diatomite) where oil spills occur. Both are swept up and disposed of.
-Exhibit S-35 Interview with Harold Parrett at NWP0033381 (2015 supplement to 104(e) Response)

Records show that during the time Beall operated at the site on Burgard way there were 2 major fires, one in 1961 and the other in 1966. Mr. Parrett provides his memory of the fires at Beall.

-Exhibit S35 Interview with Harold Parrett at NWP0033382-3 (2015 supplement to 104(e) Response)

In addition, the records of the Oregon state Fire Marshall contains a detailed report of a fire that began on June 17, 1961, prepared by Inspector R.B. Bryant, shortly after the fire occurred. Also included is a letter report from 2 fire investigators, along with diagrams the site, and interviews with several current employees of Beall.

-Exhibit S30 Beall 1961 Assembly Building - Fire Records of the Oregon State Fire Marshal and Fire Insurance Rating Bureau, ATPUB0504171 (2015 supplement to 104(e) Response)

Besides the recollections of Mr. Parrett, an article from the Oregonian newspaper dated August 23, 1966 reports on a fire that took place the day before, August 22. Fire was described this way:

"A two- alarm blaze raged through the 350–foot building housing the pipe enameling and wrapping section of the industrial complex as more than 18 workmen ran to safety. Fireman said a spark from machinery ignited volatile chemicals in the coating department."

-Exhibit S31 Fire of 1966 – Destruction of Beall Enameling and Wrapping Building – News Clipping from the *Oregonian*, 8/23/66, NWP0018284 (2015 supplement to 104(e) Response)

Mr. Parrett also describes the effects that the flood of 1964 had on the Beall operation. NWP0032866. He refers to an aerial photo that show the flooding in the area of the Beall facility, Ackroyd C 8919-2 (NWP0032985-6)

We have provided several documents that will help show the layout of the Beall operation. These are:

Exhibit S7 -Historic Aerial Photos 1962-1995 (supplement to 104(e) Response Exhibit 34) NWP0026256-26269 (2015 supplement to 104(e) Response)
(See NWP0026259 and NWP0026260, photos taken in 1962, showing the "BEALL PIPE AND TANK CORP." painted on the front of the main building; tank-truck trailers can be seen parked in the area beneath the company sign awaiting processing.)

Exhibit 58 – 1962 Map of Beall Sanitary System NWP0017454.

Exhibit 53 - Beall Stormwater Drainage (last updated in 1974) NWP0016631.

Electrical Diagrams, includes Beall Pipe and Tank Corp. Plant Layout 2/2/80. NWP0018699.

We have included Beall documents related to their Air Contaminant discharge permit. In these documents, Beall provides production data on coated steel pipe.

In 1971, Beall obtained a NPDES permit from the U.S. Army Corps of Engineers for:

> "Concrete pit used as settling basin for washing down process equipment used to make concrete lined steel pipe. Discharge from settling basin goes into storm sewer and thence to river." Under 'Principal product produced per day, they reported, "200 tons."

We have provided a detailed memorandum with exhibits to show the relationship between L.B. Foster Company and Beall Pipe and Tank Corp. (Exhibit S34, L. B. Foster Memorandum and Exhibits, NWP0033310 (2015 supplement to 104(e) Response))

LB Foster Company acquired Beall Pipe and Tank Corp. in July 1976, according to an article in the Sunday Oregonian dated November 20, 1977. NWP0033353. At the time both companies were privately held, and so public filings describing this acquisition are not available. However, William Tagmyer, who was hired to run the Beall operation, describes how he ran the company as if it was a division of the larger L.B. Foster Company. NWP0033364. He also describes the operations after the acquisition as almost entirely the same as when Beall owned the company:

> "7. When L.B. Foster took over the Burgard site from Beall Pipe and Tank Corporation, there was considerable continuity in the operations. The operations supervisors, foremen and employees remained the same. With one exception, the assets remained the same both before and after the transfer to L. B. Foster. The exception, as explained in #3 above, was that L. B. Foster after the takeover moved the large pipe spiral weld machine to the Burgard site, operated it there and sold some product thru L.B. Foster under its own name."
> (Exhibit S34, Satements and Declaration of William Tagmyer, at NWP0033366 (2015 supplement to 104(e) Response))

L.B. Foster Company became a public company in 1981 with the filing of Form S-1 with tehj S.E.C. On page 16 of that filing, they list a facility at Portland, Oregon as property that they own, where they manufacture Fosterweld and ERW pipe, perform pipe coating and wrapping and yard storage on 25 acres. Exhibit 4.1 to the Form S – 1, at page 122, discusses the "Beall Agreement", confirming that L.B. Foster Company agreed to purchase Beall on July 1, 1976. hat exhibit goes on to note that the company operates with consolidated financial statements for its wholly-owned subsidiaries. On page 149, the Beall Pipe and Tank Corp. in Oregon is listed as 100% owned by L.B. Foster Company.

NWP00_____ Excerpts from L.B. Foster SEC Form S–1 filed 4/30/81

The Tagmyer declaration provides other information on how the Beall operation was handled like a division of L.B. Foster Company. NWP0033364-65.

Included in the documents are several sales brochures and informational publications from Beall that describe their products and manufacturing processes. (NWP0032933, NWP0032950, NWP0032967, NWP0033354 NWP0032991, NWP0032904) In these publications they describe the specifications and manufacturing processes for pipe coated with Coal Tar Enamel, asphalt, and cement mortar.

The technical studies from CH2M Hill, Northwest Pipe Company's environmental consultant for the Portland Harbor Superfund project, provide evidence and technical opinion that certain contamination found on site was deposited there before Northwest Pipe Company began their operations in1982.

In summary, we have provided information to show that:

Beall purchased the property in 1950 and owned it until 1982;

Beall manufactured steel pipe using much the same processes that Northwest Pipe Company uses today;

Beall coated their steel pipe in the "smokehouse"; the coatings included coal tar enamel, asphalt, and cement mortar, and utilize chemicals such as xylene and certain epoxies;

Beall built and repaired truck tanks on the site, including washing out old truck tanks;

Beall discharged water used to clean equipment for their concrete lined steel pipe into the storm sewer and from there into the Willamette River;

L.B. Foster purchased Beall Pipe and Tank Corp., and operated that company like a division;

L.B. Foster Company continued the operations of Beall until 1982, when the assets were purchased by Northwest Pipe Company;

During the time L.B. Foster/Beall was operating, there were fires and flooding, both incidents that could result in contamination that has been discovered in the area of the Burgard Industrial park and the International Slip.